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17 Attorneys for Defendant

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 QUENTIN REAVES, DANIELLE
22 BOGAN, and ROBERT MAYO, on behalf
23 of themselves and all others similarly
24 situated,

25 Plaintiffs,

26 v.

27 SONY COMPUTER ENTERTAINMENT
28 AMERICA LLC, a Delaware Limited
Liability Company; and SONY
NETWORK ENTERTAINMENT
INTERNATIONAL LLC, a Delaware
Limited Liability Company.

Defendants.

CASE NO.: 11-cv-02254-EMC

CLASS ACTION

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
LITIGATION STAY PENDING
RESOLUTION OF THE JUDICIAL
PANEL ON MULTIDISTRICT
LITIGATION'S DECISION ON
TRANSFER ; ORDER RESETTING CMC**

1 WHEREAS, on May 6, 2011, Plaintiffs, Quentin Reaves, Danielle Bogan and Robert Mayo
2 ("Plaintiffs") filed a class action complaint against Sony Computer Entertainment America LLC
3 and Sony Network Entertainment International LLC ("Defendants") (collectively, the "Parties");

4 WHEREAS, Defendants, as well as certain related entities (collectively, the "Sony
5 Defendants"), have been named as defendants in at least 61 related class action lawsuits, including
6 this action, pending in district courts throughout the United States;

7 WHEREAS, a motion pursuant to 28 U.S.C. §1407 is currently pending before the Judicial
8 Panel on Multidistrict Litigation (the "Panel") to centralize this action and the other referenced
9 matters. A hearing on the motion for centralization in *In Re: Sony Gaming Networks and*
10 *Customer Data Security Breach Litigation* (MDL No. 2258) is scheduled before the Panel on July
11 28, 2011, in San Francisco, California;

12 WHEREAS, a ruling is expected from the Panel within a short period of time after the
13 hearing, such that any stay of proceedings in this case is expected to be limited in duration. The
14 parties will promptly advise the Court regarding the Panel's resolution of the motion to centralize
15 the related matters;

16 WHEREAS, based on the Court's May 6, 2011 Order Settling Initial Case Management
17 Conference and ADR Deadlines, (Docket No. 3), there are several imminent deadlines in this case,
18 including July 27, 2011 to meet and confer pursuant to Rule 26(f) and to file an ADR Certification;
19 August 10, 2011 to file a Rule 26(f) Report; and August 17, 2011 for an Initial Case Management
20 Conference;

21 WHEREAS, on July 19, 2011, counsel for Plaintiffs and Defendants' counsel met and
22 conferred by email, and agreed to a litigation stay, subject to approval of the Court.

23 IT IS THEREFORE STIPULATED AND AGREED, by and between the undersigned,
24 subject to approval of the Court, that all proceedings in this case are stayed pending the Judicial
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1 Panel on Multidistrict Litigation's ruling upon the motion to centralize the related matters and, if
2 centralized, such further scheduling as may be set by the Court before which the related matters are
3 centralized. A stay of this action will not prejudice any of the parties and will conserve judicial
4 time and resources by avoiding duplicative litigation if the cases are ultimately centralized by the
5 Panel.

6 DATED: July 25, 2011

Respectfully submitted,
By the Plaintiffs,
CHAVEZ & GERTLER LLP

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9 /s/ Mark A. Chavez
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13 Respectfully submitted,
By the Defendants,

14
15 /s/ Rocky C. Tsai
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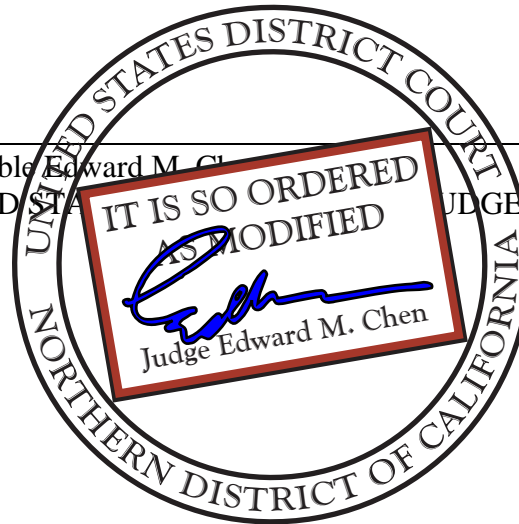
[PROPOSED] ORDER

The Court has reviewed the Parties' Joint Stipulation for Litigation Stay Pending the Resolution of the Judicial Panel on Multidistrict Litigation's decision on transfer. Good cause appearing, the Court hereby enters the Parties' Stipulation. All proceedings in this case are accordingly stayed pending the Judicial Panel on Multidistrict Litigation's decision on transfer. The parties shall promptly advise the Court regarding the Panel's resolution of the motion to centralize the related matters. The CMC set for 8/17/11 is reset for 1/27/12 at 9:00 a.m. A joint CMC statement shall be filed by 1/20/12.

IT IS SO ORDERED.

Dated: 7/28, 2011

Honorable Edward M. Chen
UNITED STATES DISTRICT COURT



SIGNATURE ATTESTATION

I, Mark Chavez, am the ECF User whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER FOR LITIGATION STAY PENDING THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION'S DECISION ON TRANSFER. In compliance with General Order 45, X.B., I hereby attest that Rocky C. Tsai has concurred in this filing.

/s/ Mark A. Chavez

Mark A. Chavez

CERTIFICATE OF SERVICE

I, Mark Chavez, hereby certify that on July 25, 2011, the foregoing document was filed electronically via the Court's ECF system. Notice of this filing will be sent to all registered users through the ECF system.

/s/ Mark A. Chavez

Mark A. Chavez